

*West Virginia Department of Environmental Protection
Division of Air Quality*

*Joe Manchin, III
Governor*

*Stephanie R. Timmermeyer
Cabinet Secretary*

Permit to Operate



*Pursuant to
Title V
of the Clean Air Act*

Issued to:
SMR Technologies
Fenwick, West Virginia
R30-06700025-2010

*John A. Benedict
Director*

*Issued: June 7, 2007 • Effective: June 21, 2007
Expiration: June 7, 2012 • Renewal Application Due: December 7, 2012*

Permit Number: **R30-06700025-2010**
Permittee: **SMR Technologies, Inc.**
Mailing Address: **93 Nettie-Fenwick Road, WV 26202-9718**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: Fenwick, Nicholas County, West Virginia
Telephone Number: (304) 846-2554
Type of Business Entity: Corporation
Facility Description:
SIC Codes: 3069
UTM Coordinates: 536.20 km Easting • 4,230.90 km Northing • Zone 17

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Table of Contents

1.0.	Emission Units and Active R13, R14, and R19 Permits	4
1.1.	Emission Units	4
1.2.	Active R13, R14, and R19 Permits	4
2.0.	General Conditions	5
2.1.	Definitions	5
2.2.	Acronyms	5
2.3.	Permit Expiration and Renewal	6
2.4.	Permit Actions	6
2.5.	Reopening for Cause	6
2.6.	Administrative Permit Amendments	7
2.7.	Minor Permit Modifications	7
2.8.	Significant Permit Modification	7
2.9.	Emissions Trading	7
2.10.	Off-Permit Changes	7
2.11.	Operational Flexibility	8
2.12.	Reasonably Anticipated Operating Scenarios	9
2.13.	Duty to Comply	9
2.14.	Inspection and Entry	9
2.15.	Schedule of Compliance	10
2.16.	Need to Halt or Reduce Activity not a Defense	10
2.17.	Emergency	10
2.18.	Federally-Enforceable Requirements	11
2.19.	Duty to Provide Information	11
2.20.	Duty to Supplement and Correct Information	11
2.21.	Permit Shield	11
2.22.	Credible Evidence	12
2.23.	Severability	12
2.24.	Property Rights	12
2.25.	Acid Deposition Control	12
3.0.	Facility-Wide Requirements	14
3.1.	Limitations and Standards	14
3.2.	Monitoring Requirements	17
3.3.	Testing Requirements	17
3.4.	Recordkeeping Requirements	18
3.5.	Reporting Requirements	19
3.6.	Compliance Plan	20
3.7.	Permit Shield	20
4.0.	Source-Specific Requirements [Boilers No. 1 001 and 007]	22
4.1.	Limitations and Standards	22
4.2.	Monitoring Requirements	22 23
4.3.	Testing Requirements	23 24
4.4.	Recordkeeping Requirements	23 24
4.5.	Reporting Requirements	23 25
4.6.	Compliance Plan	23 26

5.0.	Source-Specific Requirements [Buffing Booths (2)]	24	27
5.1.	Limitations and Standards	24	27
5.2.	Monitoring Requirements	24	27
5.3.	Testing Requirements	24	28
5.4.	Recordkeeping Requirements	25	28
5.5.	Reporting Requirements	25	29
5.6.	Compliance Plan	25	29
6.0.	Source-Specific Requirements [Paint Booth]	26	30
6.1.	Limitations and Standards	26	30
6.2.	Monitoring Requirements	26	30
6.3.	Testing Requirements	27	31
6.4.	Recordkeeping Requirements	27	32
6.5.	Reporting Requirements	27	33
6.6.	Compliance Plan	27	33
	APPENDIX A - Daily Control Device Inspection Report for Buffing Booths 002 and 005	34	
	APPENDIX B - Paint Booth 006 Daily Record Keeping Forms	35	
	APPENDIX C - Paint Booth 006 Annual Record Keeping Forms	36	
	APPENDIX D - Facility Wide Record Keeping Forms	39	
	APPENDIX E - Monthly/Quarterly Opacity Report	40	

1.0 Emission Units [and Active R13, R14, and R19 Permits](#)

[1.1. Emission Units](#)

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
001	EP001	Boiler No. 1	1978	16.8 mmBtu/hr	None
002	EP002	Buffing Booth	1978	500 lb/hr rubber	Fabric Filter
005	EP005	Buffing Booth	1978	500 lb/hr rubber	Fabric Filter
006	EP006	Paint Booth	2002	6 gal/8-hr shift	Fabric Filter
007	EP007	Cleaver-Brooks Model CB-LE 600-bhp firetube boiler	2007	24.5 mmBtu/hr	None
None	Stacks 100-122, 125, & 200-219	Assembly Tables	1978	NA	None
		Eight (8) Heat Cure Presses	1978	NA	
		Four (4) Autoclaves	1978	NA	

[1.2. Active R13, R14, and R19 Permits](#)

[The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number \(e.g. R13-1234\). The current applicable version of such permit\(s\) is listed below.](#)

Permit Number	Date of Issuance
R13-0415B	December 11, 2007

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months

2.2. Acronyms

CAAA	Clean Air Act Amendments	NESHAPS	National Emissions Standards for Hazardous Air Pollutants
CBI	Confidential Business Information	NO_x	Nitrogen Oxides
CEM	Continuous Emission Monitor	NSPS	New Source Performance Standards
CES	Certified Emission Statement	PM	Particulate Matter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	pph	Pounds per Hour
C.S.R. or CSR	Codes of State Rules	ppm	Parts per Million
DAQ	Division of Air Quality	PSD	Prevention of Significant Deterioration
DEP	Department of Environmental Protection	psi	Pounds per Square Inch
FOIA	Freedom of Information Act	SIC	Standard Industrial Classification
HAP	Hazardous Air Pollutant	SIP	State Implementation Plan
HON	Hazardous Organic NESHAP	SO₂	Sulfur Dioxide
HP	Horsepower	TAP	Toxic Air Pollutant
lbs/hr	Pounds per Hour	TPY	Tons per Year
LDAR	Leak Detection and Repair	TRS	Total Reduced Sulfur
M	Thousand	TSP	Total Suspended Particulate
MACT	Maximum Achievable Control Technology	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet Burned per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
 - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
- b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
- c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution Control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
 - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically

identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

[45CSR§30-5.1.a.2.]

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health.
[40 C.F.R. 61 and 45CSR15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1 and 45CSR13, Permit No. R13-0415A (Condition B.3.)]
- 3.1.6. The owner or operator of a plant shall maintain particulate control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR§7-5.2 and 45CSR13, Permit No. R13-0415A (Condition B.3.)]
- 3.1.7. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§7-9.1]

- 3.1.8. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]
- 3.1.9. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.10. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.
[40 C.F.R. 82, Subpart F]
- 3.1.11. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]
- 3.1.12. Total facility-wide VOC and hazardous air pollutant (HAP) emissions from the use of cements, solvents, and coatings (including those used in the paint booth, EP006) shall not exceed the following:

Pollutant	lb/hr	tpy
Total VOCs	38.75	40.3
Toluene	16.05	16.7
Hexane	6.92	7.2
Miscellaneous HAPs ¹	0.48	0.5
Total HAPs	32.4	33.7

¹Miscellaneous HAPs identified on the MSDS submitted as part of application R13-0415A include the following: Epichlorohydrin, Ethyl Benzene, Formaldehyde, Methanol, Methylenebisphenylene Isocyanate, Methyl Isobutyl Ketone, Tetrachloroethylene, and Xylene. ~~Hazardous air pollutants (HAPs) and/or toxic~~ [Toxic](#) air pollutants (TAPs) not included in this list shall be approved in accordance with ~~3.1.14. and 3.1.15:~~ [3.1.13.](#)

[45CSR13, Permit No. R13-0415A (Condition A-5: [4.1.6.](#))]

~~3.1.13. The facility-wide emission rate of Formaldehyde shall not exceed 1,000 pounds per year. Compliance with the annual emission limit shall be determined using twelve (12) month rolling total.~~
~~[45CSR13, Permit No. R13-0415 (Condition A.7.)]~~

~~3.1.14. Use of any cement, solvent, or coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed in 3.1.12. shall be in accordance with the following:~~

- ~~a. The permittee shall notify the Director in writing of the cement, solvent, or coating to be used and the HAP(s) contained therein within thirty (30) days of the use. Additionally, an MSDS sheet for the cement, solvent, or coating shall be supplied at this time to the Director.~~
- ~~b. The use of the cement, solvent, or coating shall be incorporated into the recordkeeping requirements contained herein.~~
- ~~c. The emission rate of miscellaneous HAP(s) contained within all cements, solvents, or coatings shall not equal or exceed 0.5 tons per year, on a twelve month rolling total basis.~~

~~[45CSR13, Permit No. R13-0415A (Condition A.6.)]~~

~~3.1.15.~~ [3.1.13.](#) Use of any cement, solvent, or coating containing any toxic air pollutant (TAP) as defined by West Virginia Legislative Rule 45CSR27, Section 2.10., other than Formaldehyde, shall be in accordance with the following:

- a. The permittee shall notify the Director in writing of the cement, solvent, or coating to be used and the TAP(s) contained therein within thirty (30) days of the use. Additionally, an MSDS sheet for the cement, solvent, or coating shall be supplied at this time to the Director.
- b. The use of the cement, solvent, or coating shall be incorporated into the recordkeeping requirements contained herein.
- c. The emission rate of the TAP(s) contained within the cement, solvent, or coating shall not equal or exceed, on a per-TAP basis, the annual limits contained in 45CSR27, Table A. Compliance with the annual emission limits shall be determined using twelve month rolling total.

~~[45CSR13, Permit No. R13-0415A (Condition A.8: [4.1.7.](#))]~~

~~3.1.16.~~ [3.1.14.](#) The permittee shall adhere to the following housekeeping procedures when handling solvents and cements:

- a. Place solvent or cement-laden cloth, paper, or any other absorbent applicators used for application or cleaning in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the solvent and cement.
- b. Store fresh and spent cements, solvents, and coatings in closed containers when not being used.
- c. Conduct the handling and transfer of cements, solvents, and coatings in such a manner as to minimize spills.

~~[45CSR13, Permit No. R13-0415A (Condition A.9: [4.1.8.](#))]~~

- ~~3.1.17.~~ [3.1.15.](#) The sand blasting booth shall be self-contained with emissions vented inside the building.
[45CSR13, Permit No. R13-0415A (Condition A-10: [4.1.10.](#))]

3.2. Monitoring Requirements

- 3.2.1. To demonstrate compliance with 3.1.5., the permittee shall monitor all fugitive particulate emission sources to ensure that a system to minimize fugitive emissions has been installed or implemented. Records shall be maintained stating the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable and the corrective actions taken to repair these systems.
[45CSR§30-5.1.c.]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, Permit No. R13-0415 (Condition 4.4.1.)]

- 3.4.2. **Retention of records.** The permittee shall retain and maintain records of all information required (including monitoring data, reports and notifications, and support information) for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche. ~~in computerized form in lieu of the above records.~~

[45CSR§30-5.1.c.2.B.; 45CSR13, Permit R13-0415 (Condition 3.4.1.)]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§30-5.1.c. State-Enforceable only.]

- 3.4.4. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility.

[45CSR§30-5.1.c.]

- 3.4.5. Compliance with the hourly emission limits in subsection 3.1.12. of this permit shall be demonstrated by maintaining monthly records of the name and volume of each cement/solvent/coating as applied, the hours of operation, and the mass of VOC and speciated HAPs for each cement/solvent/coating as applied. The mass of VOCs and speciated HAPs of each coating shall be determined by either certified product data sheets provided by the material supplier or 40 C.F.R. 60, Appendix A, Method 24.

In addition to the monthly record, a twelve (12) month rolling total shall be kept in order to demonstrate compliance with the annual VOC and HAP emission limits. ~~These records shall be maintained on site for a period of five (5) years and shall be made available to the Director or his/her authorized representative upon request.~~ Example recordkeeping forms are provided in Appendix D.

[45CSR13, Permit No. 0415A (Condition A.5: 4.2.5.)]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§30-4.4. and 5.1.c.3.D.]
- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]
- 3.5.3. All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class, or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]
- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]
- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. Deviations.

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
 1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
 3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
 4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

- 3.6.1. A responsible official certified in the Title V application that all air contaminant sources identified in the application are in compliance with all applicable requirements.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- a. **40 C.F.R. 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels.** The No. 2 fuel oil storage tank has a capacity of less than 75 m³.
 - b. **40 C.F.R. 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.** The [16.8 MMBtu/hr](#) boiler [No.1 \(Em. Unit ID 001, Em. Pt. ID EP001\)](#) was constructed prior to June 9, 1989; [therefore, it is not subject to the requirements of 40 C.F.R. 60 Subpart Dc. However, 40 C.F.R. 60 Subpart Dc is applicable to the 24.5 MMBtu/hr boiler \(Em. Unit ID 007, Em. Pt. ID EP007\).](#)
 - c. **40 C.F.R. 63, Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities.** The parts assembled at this facility are not critical to a vehicles' structural integrity or flight performance per 64.741(f).
 - d. **40 C.F.R. 63, Subpart OOOO - National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles.** The facility is not subject to this MACT because the fabric is not coated on a continuous web.

4.0. Source-Specific Requirements [Boiler No. 1: EP001; 600 HP Boiler: EP007]

4.1. Limitations and Standards

- 4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. [This visible emission standard shall apply at all times except in periods of start-ups, shutdowns and malfunctions. Where the Director believes that start-ups and shutdowns are excessive in duration and/or frequency, the Director may require an owner or operator to provide a written report demonstrating that such frequent start-ups and shutdowns are necessary.](#)

[45CSR§2-3.1. [and 9.1.](#), and 45CSR13, Permit No. R13-0415A (Condition B-2 [4.1.3.](#))]

- 4.1.2. Hourly and annual fuel usage rates from the boiler shall not exceed the following:

Fuel Type	Hourly Limit	Annual Limit
Natural Gas	16,800 ft ³ /hr	147 mmft ³ /yr
No. 2 Fuel Oil	120 gallons/hr	1,051,200 gallons/yr

[45CSR13, Permit No. R13-0415A, Condition A.1.]

[The total annual heat input into the boiler \(EP001\) shall not exceed 147,168 MMBtu per year.](#)

[45CSR13, Permit No. R13-0415, Condition 4.1.1.c.]

- 4.1.3. Hourly and annual emissions from the boiler ([EP001](#)) shall not exceed the following:

Pollutant	Natural Gas (lb/hr)	Fuel Oil No. 2 (lb/hr)	Tons Per Year
Carbon Monoxide	1.41	0.61	6.18
Nitrogen Oxide	1.68 2.43	2.43	10.6
Particulate Matter ¹	0.13 0.40	0.4	1.75
Sulfur Dioxide ²	0.01 3.44	3.44	15.1
VOC	0.09	0.04	0.40

¹Compliance with the streamlined particulate matter limit assures compliance with 45CSR§2-4.1.b.

²Compliance with the streamlined sulfur dioxide limit assures compliance with 45CSR§10-3.3.f.

[45CSR§2-4.1.b.; 45CSR§10-[3.3.f.](#), [3.1.f.](#); and 45CSR13, Permit No. R13-0415A (Condition A.1: [4.1.1.a.](#), [B.2.](#), & [B.4.](#))]

- 4.1.4. [The boiler \(EP001\) shall only burn either pipeline quality natural gas or #2 fuel oil with a maximum sulfur content of 0.2 percent by weight.](#)

[45CSR13, Permit No. R13-0415, Condition 4.1.1.b.]

4.1.5. Emissions from the boiler (EP007) shall not exceed the following:

<u>Emission Limits for emission source 007 (600 bhp boiler)</u>		
<u>Pollutant</u>	<u>lb/hr</u>	<u>TPY</u>
<u>PM</u>	<u>0.58 ⁽¹⁾</u>	<u>2.5</u>
<u>PM₁₀</u>	<u>0.58 ⁽¹⁾</u>	<u>2.5</u>
<u>Sulfur Dioxide (SO₂)</u>	<u>4.97 ⁽²⁾</u>	<u>21.8</u>
<u>Oxides of Nitrogen (NO_x)</u>	<u>3.50</u>	<u>15.3</u>
<u>Carbon Monoxide</u>	<u>2.06</u>	<u>9.0</u>
<u>Volatile Organic Compounds (VOCs)</u>	<u>0.13</u>	<u>0.6</u>

(1) Compliance with this PM limit ensures compliance with 45CSR§2-4.1.b.

(2) Compliance with this SO₂ limit ensures compliance with 45CSR§10-3.3.f.

[45CSR13, Permit No. R13-0415, Condition 4.1.2.d.; 45CSR§2-4.1.b.; 45CSR§10-3.3.f.]

4.1.6. The boiler (EP007) shall only burn either pipeline quality natural gas or #2 fuel oil with a maximum sulfur content of 0.2 percent by weight. Compliance with this streamlined sulfur content limit ensures compliance with the limit in applicable requirement 40 C.F.R. §60.42c(d).

[45CSR13, Permit No. R13-0415, Condition 4.1.2.e.; 40 C.F.R. §60.42c(d); 45CSR16]

4.1.7. The total annual heat input into the boiler (EP007) shall not exceed 214,620 MMBTU per year.

[45CSR13, Permit No. R13-0415, Condition 4.1.2.f.]

4.1.8. At all times, including periods of start-ups, shutdowns and malfunctions, the permittee shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, visible emission observations, review of operating and maintenance procedures and inspection of the source.

[45CSR§2-9.2.]

4.2. Monitoring Requirements

- ~~4.2.1. Visual inspection (VE) observations of the boiler shall be conducted weekly. These observations shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission point has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 C.F.R. 60, Appendix A, Method 9 evaluation within three (3) days unless the permittee can demonstrate a valid reason that the time frame should be extended. A Method 9 evaluation shall not be required if the visible emission condition is corrected within 24 hours and the emission source is operated at normal operating conditions. A record of each visible emission observation required above shall be maintained on site for a period of no less than five (5) years. Said record shall include the date, time, name of emission unit, the applicable visible emissions requirements, the results of the observation, what action (s), if any was/were taken, and the name of~~

~~the observer. Certified copies of these records shall be made available to the Director or his/her authorized representative upon request.~~

Whenever either or both boilers 001 and 007 is operating on #2 fuel oil, the permittee shall monitor visible emissions from the source(s) that is consuming #2 fuel oil. The frequency of such monitoring shall be at least once per month with a maximum of 45 days between observations. Once the unit(s) has switch back to consuming natural gas for a period of no less than thirty (30) days, then the such monitoring is no longer required. Such monitoring shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 9. Records of such monitoring shall be maintained in accordance with 3.4.2. of this permit.

[45CSR13, Permit No. R13-0415A (Condition B.5: [4.2.2.](#))]

4.3. Testing Requirements

4.3.1. ~~Reserved.~~ For the purpose of demonstrating initial compliance with the PM limit in 4.1.5. and the visible emission limit in 4.1.1. for boiler 007, the permittee shall conduct performance testing within 180 days after start-up of the unit to determine the PM emission rate from emission source 007. Such testing shall be conducted in accordance with the following:

- a. The unit shall be operating at no less than 90 percent load during each test run;
- b. The unit shall be burning only fuel oil during such testing;
- c. Such PM tests shall be conducted in accordance with 45CSR2Appendix "Compliance Test Procedures for 45CSR2" or other equivalent EPA approved method(s) approved by the Director;
- d. Method 9 reading shall be taken during each test run in accordance with 40 C.F.R. Part 60, Appendix A, Method 9;
- e. Records of such testing shall be maintained in accordance with 3.4.2. of this permit.

[45CSR13, Permit No. R13-0415, Condition 4.3.1.]

4.4. Recordkeeping Requirements

~~4.4.1. To demonstrate compliance with 4.1.2. & 4.1.3., the permittee shall maintain monthly records of the date and time of startup and shutdown, the fuel usage and the hours of operation. Compliance with the annual emission and fuel usage limits shall be based on a twelve (12) month rolling total. These records shall be maintained on site for a period of five (5) years. Certified copies of the records shall be provided to the Director or his/her authorized representative upon request.~~

~~In addition to maintaining the fuel usage and hours of operation, the permittee shall also maintain fuel quality records. Fuel quality records for natural gas shall consist of an initial characterization provided by the fuel supplier which includes the ash, sulfur, moisture, volatile matter, and Btu content. Fuel quality records for No. 2 fuel oil shall consist of an initial characterization provided by the fuel supplier which includes the ash, moisture, and volatile matter content, and an analysis of each shipment for the sulfur and Btu content.~~

[45CSR§§2A-7.1.a.1 & a.2., 45CSR§2-8.3.c. and 45CSR13, Permit No. R13-0415A (Condition A.1. and B.2.)]

4.4.1. For emission units 001 and 007, the permittee shall keep and maintain the following records to demonstrate compliance with 4.1.2., 4.1.3., 4.1.4., 4.1.5., and 4.1.6.:

- a. Date and time of start-up and shutdown by unit;
- b. Amount of natural gas and #2 fuel oil consumed by unit on a monthly basis;
- c. Total amount of #2 fuel oil delivered to the facility during each calendar month;
- d. Amount of heat input into each unit on a monthly basis, in terms of MMBTU per month;
- e. A BTU analysis of each fuel oil shipment received at the facility;
- f. Fuel supplier certification demonstrating that distillate oil (Fuel Oil) received has a sulfur content that complies with condition 4.1.4. and 4.1.6. of this permit. Such certification shall include the following:
 - i. Name of the supplier;
 - ii. A statement from the supplier that the oil complies with the specifications under the definition of distillate oil in 40 C.F.R. §60.41c.
 - iii. The sulfur content of the oil.
- g. Monthly records of the hours of operation;
- h. Fuel quality records for natural gas, consisting of an initial characterization provided by the fuel supplier which includes the ash, sulfur, moisture, volatile matter, and BTU content; and,
- i. Fuel quality records for No. 2 fuel oil, consisting of an initial characterization provided by the fuel supplier which includes the ash, moisture, and volatile matter content (in addition to BTU and sulfur content).

[45CSR13, Permit No. R13-0415, Condition 4.2.1.; 40 C.F.R. §§ 60.48c(e)(11) and 60.48c(g)(2); 45CSR16; 45CSR§2-8.3.c.; 45CSR§§2A-7.1.a.1. & a.2.]

4.5. Reporting Requirements

4.5.1. ~~Reserved.~~ The permittee shall submit a written report of the results of testing required under permit condition 4.3.1. of this permit before the close of business on the 60th day following the completion of such testing to the Director. Such report(s) shall include all records of the opacity observations, and fuel usage records taken during such testing.

[45CSR13, Permit No. R13-0415, Condition 4.5.1.]

4.5.2. The permittee shall submit a written compliance report to the Director and U.S. EPA Administrator every six months and shall be postmarked by the 30th day following the end of the reporting period. Such reporting periods shall coincide with the facility's Title V semi-annual and annual compliance reports in permit conditions 3.5.5. and 3.5.6. This report shall include the following:

- a. Calendar dates covered in the reporting period;

- [b. Records of the fuel supplier certifications;](#)
- [c. Certified statement signed by permittee responsible official that all of the records of the fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.](#)

[\[45CSR13, Permit No. R13-0415, Condition 4.5.2.; 40 C.F.R. §§ 60.48c\(d\), \(e\) and \(j\); 45CSR16\]](#)

[4.5.3. For boiler 007, the permittee shall submit notification of the date of construction and actual startup, as provided by 40 C.F.R. §60.7. This notification shall include:](#)

- [a. The design heat input capacity of the boiler and identification of fuels to be combusted in the affected facility.](#)
- [b. If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 C.F.R. §60.42c, or 40 C.F.R. §60.43c.](#)
- [c. The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.](#)

[\[40 C.F.R. §60.48c\(a\); 45CSR16\]](#)

4.6. Compliance Plan

- 4.6.1. A responsible official certified in the Title V application that all air contaminant sources identified in the application are in compliance with all applicable requirements.

5.0. Source-Specific Requirements [Buffing Booths: EP002 & EP005]

5.1. Limitations and Standards

- 5.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty percent opacity [except for visible particulate matter emission less than 40% for a period or periods aggregating no more than 5 minutes in any 60 minute period.](#)
~~[45CSR§§7-3.1. and 3.2., and 45CSR13, Permit No. R13-0415A (Condition B-3: 4.1.9.)]~~
- 5.1.2. Hourly and annual emissions from the buffing booths shall not exceed the following:

Booth	PM Emissions	
	lb/hr	tpy
002	0.5	0.5
005	0.5	0.5
Total	1.0	1.0

Compliance with the streamlined particulate matter limit assures compliance with 45CSR§7-4.1.

~~[45CSR§7-4.1. and 45CSR13, Permit No. R13-0415A (Condition A-2: 4.1.4. & B-3:)]~~

- [5.1.3. Operation and Maintenance of Air Pollution Control Equipment.](#) The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[\[45CSR§13-5.11.; 45CSR13, Permit R13-0415 \(Condition 4.1.11.\)\]](#)

5.2. Monitoring Requirements

- 5.2.1. Compliance with the hourly and annual particulate emission limits shall be demonstrated by proper operation and maintenance of the particulate matter control devices. The permittee shall conduct daily inspections of the capture systems and the filters during operation and shall promptly replace filters when necessary and conduct any necessary maintenance and repair.
~~[45CSR13, Permit No. R13-0415A (Condition A-2: 4.2.3.)]~~
- 5.2.2. ~~Visual inspection (VE) observations of the buffing booths shall be conducted weekly. These observations shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission point has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 C.F.R. 60, Appendix A, Method 9 evaluation within three (3) days unless the permittee can demonstrate a valid reason that the time frame should be extended. A Method 9 evaluation shall not be required if the visible emission condition is corrected within 24 hours and the emission source is operated at normal operating conditions. A record of each visible emission observation required above shall be maintained on site for a period of no less than five (5) years. Said record shall include the date, time, name of emission unit, the~~

~~applicable visible emissions requirements, the results of the observation, what action(s), if any was/were taken, and the name of the observer. Certified copies of these records shall be made available to the Director or his/her authorized representative upon request.~~

For the purpose of determining compliance with the opacity limits of condition 5.1.1., the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per calendar month with a maximum of fortyfive (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of 45CSR7A as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A 45CSR7A observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

[45CSR13, Permit No. R13-0415A (Condition B.5: [4.2.6.](#))]

5.3. Testing Requirements

5.3.1. Reserved.

5.4. Recordkeeping Requirements

5.4.1. Records of the inspections required in 5.2.1. above shall be maintained which indicate the date and time, if the capture system and control device were operating properly, if the filter was changed, any maintenance conducted, and the control device's operating parameters used to indicate proper operation. ~~These records shall be maintained on site for a period of five (5) years. Certified copies of these records shall be made available to the Director or his/her authorized representative upon request.~~ Example recordkeeping forms are provided in Appendix A.

[45CSR13, Permit No. R13-0415A (Condition A.2: [4.2.3.](#))]

5.4.2. The permittee shall maintain records of all monitoring data required by condition 5.2.2. documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). An example form is supplied as Appendix E. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall

be maintained per the requirements in 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.
[45CSR13, Permit No. R13-0415 (Condition 4.4.4.)]

5.4.3. Record of Maintenance of Air Pollution Control Equipment. For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR13, R13-0415 (Condition 4.4.2.)]

5.4.4. Record of Malfunctions of Air Pollution Control Equipment. For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, R13-0415 (Condition 4.4.3.)]

5.5. Reporting Requirements

5.5.1. Reserved. Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 45CSR7A must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days of the occurrence, and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
[45CSR13, Permit No. R13-0415 (Condition 4.5.3.)]

5.6. Compliance Plan

5.6.1. A responsible official certified in the Title V application that all air contaminant sources identified in the application are in compliance with all applicable requirements.

6.0. Source-Specific Requirements [Paint Booth: EP006]

6.1. Limitations and Standards

- 6.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty percent opacity [except for visible particulate matter emission less than 40% for a period or periods aggregating no more than 5 minutes in any 60 minute period.](#) ~~[45CSR§7-3.1. and 3.2., and 45CSR13, Permit No. R13-0415A (Condition B-3: 4.1.9.)]~~
- 6.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A.

Paint Booth	Table 45-7A*
	lb/hr
EP006	0.06

* Maximum Allowable Particulate Emission Limit

~~[45CSR§7-4.1. and 45CSR13, Permit No. R13-0415A (Condition B-3:)]~~

- ~~6.1.2.~~ [6.1.3.](#) Hourly and annual emissions from the paint booth shall not exceed the following:

Paint Booth	VOC Emissions	
	lb/hr	tpy
EP006	4.80	0.97

~~[45CSR13, Permit No. R13-0415A (Condition A-3: 4.1.4.)]~~

- ~~6.1.3.~~ [6.1.4.](#) The paint booth shall be fully enclosed with emissions vented to filters. These filters shall be operated at all times when the paint booth is operating. In addition, the filter system shall be equipped with a manometer and alarm system to indicate when the filters must be changed and an interlock which will shut the system down if the filters are not changed.

~~[45CSR13, Permit No. R13-0415A (Condition A-4: 4.1.5.)]~~

- [6.1.5.](#) **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. [\[45CSR§13-5.11.; 45CSR13, Permit R13-0415 \(Condition 4.1.11.\)\]](#)

6.2. Monitoring Requirements

- 6.2.1. Compliance with the hourly [VOC](#) emission limits [of condition 6.1.3.](#) shall be demonstrated by maintaining daily records of the name and volume of each coating as applied, the hours of operation, and the mass of VOC and speciated HAPs for each coating as applied. The mass of VOCs and speciated HAPs of each coating shall be

determined by either certified product data sheets provided by the material supplier ~~of~~ [or](#) 40 C.F.R. 60, Appendix, Method 24.

[45CSR13, Permit No. R13-0415A (Condition A-3: [4.2.4.](#))]

- 6.2.2. ~~Visual inspection (VE) observations of the paint booth shall be conducted weekly. These observations shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission point has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 C.F.R 60, Appendix A, Method 9 evaluation within three (3) days unless the permittee can demonstrate a valid reason that the time frame should be extended. A Method 9 evaluation shall not be required if the visible emission condition is corrected within 24 hours and the emission source is operated at normal operating conditions. A record of each visible emission observation required above shall be maintained on site for a period of no less than five (5) years. Said record shall include the date, time, name of emission unit, the applicable visible emissions requirements, the results of the observation, what action (s), if any was/were taken, and the name of the observer. Certified copies of these records shall be made available to the Director or his/her authorized representative upon request.~~

For the purpose of determining compliance with the opacity limits of condition 6.1.1., the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per calendar month with a maximum of fortyfive (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of 45CSR7A as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A 45CSR7A observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

[45CSR13, Permit No. R13-0415A (Condition B-5: [4.2.6.](#))]

6.3. Testing Requirements

- 6.3.1. Reserved.

6.4. Recordkeeping Requirements

- 6.4.1. In addition to the daily records, a record with the monthly emissions and twelve (12) month rolling totals shall be kept in order to demonstrate compliance with the annual emission limits. ~~These records shall be maintained on site for a period of five (5) years and certified copies shall be made available to the Director or his/her authorized representative upon request. [Example recordkeeping forms are provided in Appendices B and C.](#)~~ **[45CSR13, Permit No. R13-0415A (Condition A.3: [4.2.4.](#))]**
- 6.4.2. **[Record of Maintenance of Air Pollution Control Equipment.](#)** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures. This shall include ~~Records~~ records indicating the dates the filters used to control particulate emissions in the paint booth are changed shall be maintained [as required in condition 6.1.4.](#) ~~on site for a period of five (5) years and certified copies shall be made available to the Director or his/her authorized representative upon request.~~ **[45CSR13, Permit No. R13-0415A (Condition A.4: [4.4.2.](#))]**
- [6.4.3.](#) [The permittee shall maintain records of all monitoring data required by condition 6.2.2. documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check\(s\), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions \(i.e. sunny, approximately 80° F, 6-10 mph NE wind\) during the visual emission check\(s\). An example form is supplied as Appendix E. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall be maintained per the requirements in 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" \(O/S\) or equivalent.](#) **[45CSR13, Permit No. R13-0415 (Condition [4.4.4.](#))]**
- [6.4.4.](#) **[Record of Malfunctions of Air Pollution Control Equipment.](#)** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. [The equipment involved.](#)
 - b. [Steps taken to minimize emissions during the event.](#)
 - c. [The duration of the event.](#)
 - d. [The estimated increase in emissions during the event.](#)
- [For each such case associated with an equipment malfunction, the additional information shall also be recorded:](#)
- e. [The cause of the malfunction.](#)
 - f. [Steps taken to correct the malfunction.](#)

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, R13-0415 (Condition 4.4.3.)]

6.5. Reporting Requirements

- 6.5.1. ~~Reserved.~~ Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 45CSR7A must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days of the occurrence, and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
[45CSR13, Permit No. R13-0415 (Condition 4.5.3.)]

6.6. Compliance Plan

- 6.6.1. A responsible official certified in the Title V application that all air contaminant sources identified in the application are in compliance with all applicable requirements.

APPENDIX A: Daily Control Device Inspection Reports for the Buffing Booths 002 and 005

Month/Year:

	Buffing Booth 002					Buffing Booth 005			
Date	Time	Capture/Control System operating properly?	Manometer Reading	Filter changed	Maintenance conducted? If so, describe.	Time	Capture/Control System Operating Properly?	Filter changed	Maintenance conducted? If so, describe.
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									

Date (mm/dd/yy):

[illegible]

$$E_{VOC} = \sum_{i=1}^n A_i B_i$$

$$F_{TCC} = \frac{\sum_{i=1}^n A_i B_i}{b}$$

$$E_{HAP} = \sum_{i=1}^n A_i B_i$$

Time	Capture/Control System operating properly?	Manometer Reading	Filters changed?	Maintenance conducted? If so, describe.

APPENDIX C: Paint Booth 006 Annual Record Keeping Forms

Year:

Month	Monthly VOC Emissions ¹ (lb/month)	12 Month Rolling Total VOC Emissions ² (lbs/yr)	HAPs (list individually)	Monthly HAP Emissions ³ (lb/month)	12 Month Rolling Total HAP Emissions ⁴ (lb/yr)
January					
February					
March					
April					

Month	Monthly VOC Emissions ¹ (lb/month)	12 Month Rolling Total VOC Emissions ² (lbs/yr)	HAPs (list individually)	Monthly HAP Emissions ³ (lb/month)	12 Month Rolling Total HAP Emissions ⁴ (lb/yr)
May					
June					
July					
August					

Month	Monthly VOC Emissions ¹ (lb/month)	12 Month Rolling Total VOC Emissions ² (lbs/yr)	HAPs (list individually)	Monthly HAP Emissions ³ (lb/month)	12 Month Rolling Total HAP Emissions ⁴ (lb/yr)
September					
October					
November					
December					

¹ Monthly VOC emissions shall be calculated by adding the daily VOC emissions from Attachment C.

² The 12 month rolling total shall be calculated as the sum of the monthly emission rates of VOCs from the previous 12 months.

³ Speciated monthly HAP emissions shall be calculated by adding each HAP's daily emissions from Attachment C.

The 12 month rolling total for each HAP shall be calculated as the sum of the monthly emission rates of each HAP from the previous 12 months.

[illegible]

APPENDIX E - MONTHLY/QUARTERLY OPACITY REPORT

Date of Observation:

Date Entered by:

Reviewed by:

Date Reviewed:

General Weather Conditions: _

Emission Point ID	Description of Emission Point	Time of Observation	Visible Emissions (Yes/No)	Consecutive Months of Visible Emission	Comments